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*Attorney for Defendant*  
*Rowland Marcus Andrade*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

UNITED STATES OF AMERICA,

*Plaintiff,*

v.

ROWLAND MARCUS ANDRADE,

*Defendant.*

Case No. 20-cr-00249-RS

**DECLARATION OF JOHN M.  
PIERCE**

*In Support of Defendant's Motion for  
Administrative Relief*

**DECLARATION OF JOHN M. PIERCE**

I, John M. Pierce, declare as follows:

1. I am counsel for Defendant Rowland Marcus Andrade in the above-captioned matter. I submit this declaration in support of Defendant's Motion for Administrative Relief to Enlarge Time to file his opposition to the government's Application for Order Issuing Forfeiture Money Judgment.

2. On September 25, 2025, the Court granted Defendant's earlier request for a consolidated deadline of October 3, 2025, both for his bond reply and his forfeiture opposition. Defendant will file the bond reply today.

3. With respect to the forfeiture opposition, I am reviewing multiple filings, including Dkts. 711, 713, 721, 728, 732, 737. The Court's September 8, 2025 order (Dkt. 736) references two

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1 sealed exhibits (ECF 732-2 and 732-3) attached to the declaration at ECF 732-1. Those exhibits  
2 were filed manually with the Clerk's Office and are not accessible through ECF.

3 4. I have contacted both prior defense counsel and the government to obtain access to these  
4 materials via secure file-sharing, but I have not yet been able to review them.

5 5. Given the complexity of the record, the sealed nature of critical exhibits, and the  
6 importance of accurate calculations, a short extension until October 9, 2025 is necessary to allow  
7 the defense to complete its review and submit an informed opposition. This amounts to a six-day  
8 extension, just under one week.  
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10  
11 I declare under penalty of perjury that the foregoing is true and correct.

12 Executed on this 3rd day of October, 2025, at West Melbourne, Florida.  
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16 John M. Pierce

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DECLARATION OF JOHN M. PIERCE